

NICHOLAS A. TRUTANICH
United States Attorney
Nevada Bar No. 13644
SUPRIYA PRASAD
Assistant United States Attorney
District of Nevada
501 Las Vegas Blvd. So., Suite 1100
Las Vegas, Nevada 89101
(702) 388-6336
supriya.prasad@usdoj.gov
Attorneys for the United States

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JAIME MENDOZA,

Defendant.

Case No. 2:19-cr-00262-GMN-DJA

Protective Order

This matter, having come before the Court by way of the Government's Motion to Compel Discovery (ECF No. 42) and the Court, having considered the matter and for the reasons stated in the Court's December 3, 2020 order (ECF No. 50), hereby Orders production of the materials requested in the Motion to Compel and enters the following PROTECTIVE ORDER:

1. The Defendant shall produce any and all reports, raw testing data, scoresheets, worksheets, notes, protocols, test question materials, any result summaries and interpretative reports not already produced related to psychological tests listed on the first page of Dr. Leany's report dated September 29, 2020, and underlying facts and data supporting Dr. Leany's opinion (hereby "Protected Material").

1 2. Access to the Protected Material shall be limited to the following individuals: the
2 defendant, attorneys for all parties, and any personnel that the attorneys for all parties consider
3 necessary to assist in performing that attorneys' duties in the prosecution or defense of this case,
4 including investigators, paralegals, experts, support staff, interpreters, and any other individuals
5 specifically authorized by the Court (collectively, the "Covered Individuals").

6 3. Without leave of Court, the Covered Individuals shall not:

- 7 a. make copies for, or allow copies of any kind to be made by any other
8 person of the Protected Material in this case or permit dissemination of the
9 Protected Material at the Pahrump jail facility, or any other detention
10 facility where the Defendant is housed, to include leaving a copy of the
11 Protected Material at any detention facility where the Defendant is
12 housed;
- 13 b. allow any other person to read, listen, or otherwise review the Protected
14 Material;
- 15 c. use the Protected Material for any other purpose other than preparing to
16 defend against or prosecute the charges in the indictment or any further
17 superseding indictment arising out of this case; or
- 18 d. attach the Protected Material to any of the pleadings, briefs, or other court
19 filings except to the extent those pleadings, briefs, or filings are filed under
20 seal.

21 4. Nothing in this Order is intended to restrict the parties' use or introduction of the
22 Protected Material as evidence at sentencing or support in motion practice.

23 5. The parties shall inform any person to whom disclosure may be made pursuant to
24 this order of the existence and terms of this Court's order.

1 6. Should a reasonable need for this protective order cease to exist, on grounds other
2 than a Covered Individual or some other person violating or circumventing its terms, the
3 Government will move expeditiously for its dissolution.

4 **IT IS SO ORDERED:**

5 
6 _____
7 DANIEL J. ALBREGTS
8 United States Magistrate Judge
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

December 8, 2020

Date